



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION III  
841 Chestnut Building  
Philadelphia, Pennsylvania 19107-4431

December 12, 1996

Mr. Dave Foley, BEC  
Directorate of Public Works  
US Army Garrison, Fort Pickett  
Blackstone, Virginia 23824

Dear Dave:

I am forwarding my recommendations to the Statement of Work (SOW) for the Preliminary Assessment (PA) investigations which will be conducted at Fort Pickett in the near future.

If you recall, the PA will provide the Base Cleanup Team (BCT) an opportunity to focus on the excess property so that decisions may be made regarding cleanup. I anticipate that the SOW for the PA will maintain the integrity of the cleanup strategy the BCT has agreed upon. This includes the incorporation of an investigative zone strategy that will partition the excess property into manageable areas as well as identifying the Areas of Concern (AOC), or Operable Units (OU), located in each zone.

The purpose of the PA is to make a determination regarding the implementability of the Remedial Investigation and Feasibility Study (RIFS) phase of the cleanup process. I believe the information available at Fort Pickett can be used to the maximum extent practicable so that recommendations regarding future action may be easily compiled. I envision that following the PA, limited field studies will be completed to fill data gaps and/or RIs will be initiated. Please note that the human health and ecological risk assessment ultimately will establish cleanup levels for the various parcels regardless of whether an RI has taken place. The EPA Region III Pre-remedial toxicological evaluation procedure should be used in the initial evaluation of AOCs. The EPA Region III Risk Based Concentrations (RBC) tables and the EPA Region III Biological Technical Assistance screening levels should be used as a reference for the determination of chemicals of concern. In the event of an RI the conclusions from the risk assessment will facilitate the FS and the identification of viable remedial alternatives.

It is my understanding that the Local Reuse Plan (LRP) completed by the Local Reuse Authority (LRA) will identify intended land use for the various parcels located in the excess area and this plan will be finalized sometime in early 1997. Therefore any cleanup action should be in accordance with the intended land use. It is also my understanding that in the event the LRA does identify an intended land use the BCT will assume a likely land use and identify cleanup levels accordingly. You should be aware that the most conservative approach to handle these parcels would be to establish cleanup levels for a residential scenario. In the absence of an LRA designated reuse or

a deed restricted reuse it is anticipated that risk will be evaluated using a residential reuse scenario.

The following recommendations are offered. The PA report should include the following elements. Every parcel within each investigative zone coinciding with an AOC should take this format. In addition for those parcels which do not contain an AOC it is expected that this PA process will require a thorough reconnaissance of all parcels for the purpose of identifying potential AOCs. New areas are being identified, such as the POW landfill, which should be identified and delineated through additional reconnaissance.

### **Background**

Describe the parcel(s) in terms of location, size, waste type, and historical significance.

### **Site Environmental Setting and Geology**

Describe the environmental setting and geology of the parcel(s). This includes a description regarding geological formations, hydrogeology, types of soil, characteristics of soil, depth to groundwater, direction and rate of groundwater movement, sensitive environments, well location (monitoring and private), recreational areas (including wildlife and fisheries management), drainage pathways, frequency of flooding, and probable points of entry to surface water bodies. This section should also address the known or potential sources which may impact the public water supply on the Nottoway River including a zone 5 miles upstream from the raw water intake.

### **Waste Characteristics**

Describe the location, type, and quantities of waste as well as the physical or chemical characteristics of any remaining waste at the site. This includes a description regarding the toxicity and mobility characteristics of the contaminant(s).

### **Potential Pollutant Migration Pathways**

Describe the all potential migration pathways. This includes groundwater, surface water, soil, subsoil, air, and migration through the food chain (tissue) both terrestrial and aquatic organisms as well as a discussion as to whether the receptor may be human or ecological.

### **Evidence of Release**

Present all available analytical data concerning parcel(s). A table should be included to identify the parameter analyzed, amount detected, and the applicable standard.

**Data Evaluation**

Describe the analysis used for the all available sampling data. The results should be presented in an organized and logical manner so that the relationship between results, medium, and validation procedure are apparent. This section should include the parameter analyzed, detection limit, applicable units, amount detected, date of analysis, and method of analysis and whether the level is considered I, II, or III. Regarding groundwater samples, a discussion concerning the construction of the wells should be included. Comments regarding the suitability of the sampling plan should also be provided. This includes appropriate quality assurance and control samples and an appropriate number of field and background samples. Data from background samples will be addressed at the completion of the risk assessment for an AOC.

**Recommendations**

Provide recommendations for further action.

If you have questions or concerns regarding the contents of this letter, please do not hesitate to call me at (215) 566-3371.

Sincerely,

A handwritten signature in black ink that reads "Michael Taurino". The signature is fluid and cursive, with the first name "Michael" and last name "Taurino" clearly distinguishable.

Michael Taurino  
Remedial Project Manager  
Federal Facilities Branch

cc: D. Willis (VDEQ)  
F. Gilmore (Army Corps)

